

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**KHADIJA LAAMIME,**

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Plaintiff,

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)

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v.

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**Case No. 1:13-cv-00793-CMH-JFA**

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**SANAA ABOUZOID and AYMAN EL  
TARABISHY,**

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)

)

Defendants.

)

**PLAINTIFF'S MOTION FOR PROTECTIVE ORDER REGARDING INFORMATION  
RELATED TO PLAINTIFF'S IMMIGRATION STATUS**

Plaintiff Khadija Laamime, by and through her undersigned attorneys and pursuant to Federal Rule of Civil Procedure 26(c), respectfully moves this Court for a protective order preventing discovery of Plaintiff's immigration status after December 29, 2011, as well as any related immigration documentation. A memorandum in support and a proposed order accompany submission of the instant Motion.

Pursuant to Local Civil Rule 7, counsel for Plaintiff contacted counsel for Defendant, via email on December 11, 2013, and counsel for both parties conferred via email and telephone on December 12, 2013, in an effort to come to an agreement on the terms of the discovery at issue. While able to reach agreement on other discovery matters, counsel were unable to reach an agreement on discovery of immigration documentation, necessitating the instant briefing and

Motion.<sup>1</sup>

Dated: December 19, 2013

Respectfully Submitted,

/s/ Mary D. Hallerman

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<sup>1</sup> Plaintiff's counsel was informed by the Clerk's Office on Thursday, December 19, 2013, that her Motion – originally included in the same document as her opposition to Defendants' December 13, 2013, Motion to Compel (Dkt. Nos. 33, 36, and 37) – must be set forth as a separate and standalone motion and memorandum in support. Plaintiff therefore submits the following Motion and Memorandum in Support, but notes that the relief requested in this Motion was included in Docket Numbers 36 and 37.

Furthermore, given the full overlap between the issues presented in Defendants' Motion to Compel and Plaintiff's Motion for a Protective Order, as well as the importance of these issues to both parties' case preparation, Plaintiff respectfully requests that this Court hear argument on the Defendants' Motion and Plaintiff's Motion together on the appropriate date of its choosing. In case the court so decides, Plaintiff is prepared to address both motions during this Friday's previously scheduled hearing. In the alternative, Plaintiff respectfully requests that this Court delay any ruling on Defendants' Motion until after a hearing can be held regarding Plaintiff's Motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2013, a copy of the foregoing was served with the Clerk of Court using the CM/ECF system, and that all counsel of record are registered users and will receive notification of this filing.

/s/ Mary D. Hallerman

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